

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

**IN RE:**

\$84,920.00 U.S. Currency (21-DEA-683276)

\$50,183.00 U.S. Currency (21-DEA-683277)

**Misc. No.:** 22-50288

**Honorable:** Mark A. Goldsmith

Defendants *in Rem*.

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**Stipulation and Order Extending United States' Time to File  
Forfeiture Complaint and to Toll the Civil Filing Deadline**

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It is hereby stipulated by and between the United States of America, by and through its undersigned attorneys, and Christopher Lewis and Camillya Doss, by and through their attorney, Byron Pitts, as follows:

1. On September 14, 2021, the Drug Enforcement Administration (“DEA”) seized the following property: \$84,920.00 U.S. Currency and \$50,183.00 U.S. Currency (collectively referred to herein as the “Subject Property”).

2. The Parties acknowledge and stipulate that DEA provided notice as required by 18 U.S.C. § 983(a)(1)(A) of the seizure and its intent to administratively forfeit the Subject Property to all known interested parties, including to Christopher Lewis and Camillya Doss.

3. Christopher Lewis and Camillya Doss filed a claim in the administrative forfeiture proceeding with DEA regarding the Subject Property. No other person has filed a claim to the Subject Property in the administrative

forfeiture proceeding.

4. DEA referred the administrative claim to the United States Attorney's Office for civil judicial forfeiture proceedings.

5. Pursuant to 18 U.S.C. § 983(a)(3)(A) and (B), within 90 days after a claim has been filed in an administrative forfeiture proceeding, the United States is required to do one of the following:

(a) file a complaint for forfeiture against the claimed property,

(b) return the claimed property, or

(c) include the claimed property for forfeiture in a criminal action,

in order for the United States to take further action to effect the civil forfeiture of the claimed property in connection with the underlying offense, unless the court extends the deadline for good cause shown or by agreement of the parties. In this case, the 90-day deadline would be **March 15, 2022**.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend the 90-day deadline set forth in 18 U.S.C. § 983(a)(3)(A) and (B), and to toll the deadline, in order for the parties to have a reasonable and sufficient period in which to evaluate their respective interests in and positions regarding the Subject Property.

7. Christopher Lewis and Camillya Doss knowingly, intelligently, and voluntarily gives up any rights they may have under 18 U.S.C. § 983(a)(3)(A) and

(B) to require the United States to file a complaint for forfeiture against the Subject Property, to return the Subject Property, and/or to include the Subject Property for forfeiture in a criminal action by **March 15, 2022**.

8. The parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the Subject Property, to return the Subject Property, and/or to include the Subject Property for forfeiture in a criminal action to toll the civil filing deadline shall be extended **90 days** from **March 15, 2022** to and including **June 13, 2022**.

9. Christopher Lewis and Camillya Doss waive all constitutional and statutory challenges related to the foregoing extension and give up any rights they may have to seek dismissal of any civil forfeiture complaint and/or any criminal forfeiture allegation in a criminal action on the ground that forfeiture proceedings were not timely commenced. Christopher Lewis and Camillya Doss further waive and agree to the tolling of any rule or provision of law limiting the time for commencing, or providing notice of, forfeiture proceedings with respect to the Subject Property, including, but not limited to, the limitations contained in 18 U.S.C. § 983 and 19 U.S.C. § 1621.

10. Christopher Lewis and Camillya Doss agree that until the United States files a complaint for forfeiture against the Subject Property and/or alleges forfeiture of the Subject Property in a criminal action, or until **June 13, 2022**,

whichever occurs first, the Subject Property shall remain in the custody of the United States and Christopher Lewis and Camillya Doss shall not seek its return for any reason in any manner.

11. By signing below, Byron Pitts declares that prior to signing this Stipulation, he provided a copy of it to Christopher Lewis and Camillya Doss, reviewed it with Christopher Lewis and Camillya Doss, consulted with Christopher Lewis and Camillya Doss regarding its contents, answered any questions Christopher Lewis and Camillya Doss had about it, determined that Christopher Lewis and Camillya Doss understand its terms and are aware of their rights in this matter, and Christopher Lewis and Camillya Doss authorized Byron Pitts to sign this Stipulation.

12. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

**IT IS SO ORDERED.**

Dated: March 8, 2022  
Detroit, Michigan

s/Mark A. Goldsmith  
MARK A. GOLDSMITH  
United States District Judge

Approved as to form and substance:

Dawn N. Ison  
United States Attorney

S/Cassandra M. Resposo  
Cassandra M. Resposo (IL 6302830)  
Assistant United States Attorney

S/Byron Pitts (see attached)  
Byron Pitts  
Law Office of Byron H. Pitts

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Dated: March 1, 2022

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(313) 964-7222  
bpittslaw@sbcglobal.net

Dated: March 5, 2022

whichever occurs first, the Subject Property shall remain in the custody of the United States and Christopher Lewis and Camillya Doss shall not seek its return for any reason in any manner.

11. By signing below, Byron Pitts declares that prior to signing this Stipulation, he provided a copy of it to Christopher Lewis and Camillya Doss, reviewed it with Christopher Lewis and Camillya Doss, consulted with Christopher Lewis and Camillya Doss regarding its contents, answered any questions Christopher Lewis and Camillya Doss had about it, determined that Christopher Lewis and Camillya Doss understand its terms and are aware of their rights in this matter, and Christopher Lewis and Camillya Doss authorized Byron Pitts to sign this Stipulation.

12. By their signatures below, the Parties agree to all of the terms and conditions stated herein.

Approved as to form and substance:

Dawn N. Ison  
United States Attorney

S/Cassandra M. Resposo  
Cassandra M. Resposo (IL 6302830)  
Assistant United States Attorney  
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Dated: March 1, 2022

  
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Dated: